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Attorneys for Defendant Ashley Coles, the
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

American General Life Insurance
Company, a Texas corporation,

Plaintiff,

vs.

Ashley M. Coles, as Trustee of the Ashley
M. Coles Family Trust; Francine Coles, an
Arizona resident and both individually and
as conservator of Z.A. Coles and S.B.
Coles, minors; Haley Brooke Coles, an
Arizona resident; John and Jane Does I-X;
and Black and White Entities A-Z,

Defendants.

No. CV09-01603-PHX-ROS

**ANSWER TO COMPLAINT IN
INTERPLEADER**

Ashley Coles, as trustee of the Ashley M. Coles Family Trust ("Coles"), by and
through her counsel undersigned, hereby Answers the Complaint in Interpleader filed by
American General Life Insurance Company ("American General"), as follows:

1. Coles admits the allegations contained in Paragraph 1.
2. Coles admits the allegations contained in Paragraph 2.
3. Coles admits the allegations contained in Paragraph 3.
4. Coles admits the allegations contained in Paragraph 4.
5. No allegations are made against Coles in Paragraph 5 and therefore Coles
has no response thereto.

1 6. Coles admits the allegations contained in Paragraph 6.

2 7. Coles admits the allegations contained in Paragraph 7.

3 8. Coles admits the allegations contained in Paragraph 8.

4 9. Coles admits the allegations contained in Paragraph 9.

5 10. Coles admits the allegations contained in Paragraph 10.

6 11. Coles admits the allegations contained in Paragraph 11.

7 12. Coles admits the allegations contained in Paragraph 12.

8 13. Coles admits the allegations contained in Paragraph 13.

9 14. Coles admits the allegations contained in Paragraph 14.

10 15. Coles admits the allegations contained in Paragraph 15.

11 16. Coles admits the allegations contained in Paragraph 16.

12 17. Coles admits the allegations contained in Paragraph 17.

13 18. Coles admits the allegations contained in Paragraph 18.

14 19. Coles admits the allegations contained in Paragraph 19.

15 20. Coles admits the allegations contained in Paragraph 20.

16 21. Responding to the allegations contained in Paragraph 21, Coles admits that
17 it appears that Scott M. Coles authored letters and states that the letters speak for
18 themselves and denies all other allegations contained in Paragraph 21.

19 22. Coles admits the allegations contained in Paragraph 22.

20 23. Coles admits the allegations contained in Paragraph 23.

21 24. Coles admits the allegations contained in Paragraph 24.

22 25. Coles admits the allegations contained in Paragraph 25.

23 26. With respect to the allegations contained in Paragraph 26, Coles is without
24 sufficient information or belief to affirm or deny the same and accordingly denies such
25 allegations.

26 27. With respect to the allegations contained in Paragraph 27, Coles is without
27 sufficient information or belief to affirm or deny the same and accordingly denies such
28 allegations.

1 28. Coles admits the allegations contained in Paragraph 28.

2 29. Coles admits the allegations contained in Paragraph 29.

3 30. With respect to the allegations contained in Paragraph 30, Coles
4 incorporates all previous admissions and denials as if fully stated herein.

5 31. With respect to the allegations contained in Paragraph 31, Coles denies that
6 the other defendants have any claim to the proceeds of any life insurance policy obtained
7 by Scott M. Coles from American General.

8 32. Coles admits the allegations contained in Paragraph 32.

9 33. Coles admits the allegations contained in Paragraph 33.

10 34. Coles admits the allegations contained in Paragraph 34.

11 35. Coles admits the allegations contained in Paragraph 35.

12 36. Coles reserves the right to assert any and all of the affirmative defenses
13 outlined in Federal Rule of Civil Procedure 8(c) as discovery may prove applicable.

14 WHEREFORE, Coles requests Judgment as follows:

15 A. Directing the payment of reasonable attorneys' fees and costs incurred by
16 American General in bringing the Interpleader Complaint;

17 B. Directing the payment of the life insurance policy proceeds to Coles;

18 C. Directing American General to issue Internal Revenue Service Form 712s to
19 Coles; and

20 D. Entering any other relief the Court deems appropriate under the
21 circumstances.

22 RESPECTFULLY SUBMITTED this 12th day of August, 2009.

23 QUARLES & BRADY LLP
24 Renaissance One
25 Two North Central Avenue
26 Phoenix, AZ 85004-2391

27 By s/ C. Bradley Vynalek
28 C. Bradley Vynalek

Attorneys for Defendant Ashley Coles, the
trustee of Ashley M. Coles Family Trust

CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2009, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and distribution to the following parties:

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